

# Top Twenty

**Most Commonly Cited or  
Misunderstood Code Sections**

**Or**

**Ways to Tell Your Audit Is  
Going South**

# Audit Indicators

- The State / DOT

Has Set Up  
Temporary  
Housing In Your  
Parking Lot!



# Continuing Surveillance

- (a) Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.

# Responses - Intent

- “Every day I keep my eyes open and watch what is happening with the system.”
- What is really meant by “continuing surveillance” is a periodic “management review” considering the interrelation of ...
- Paper trail for follow up work

# Audit Indicators

- Your Inspector insists on wearing flame retardant clothing before starting your field inspection!



# O &M Procedures

- (b) (8) Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedure when deficiencies are found

# Responses - Intent

- “We review employee evaluations annually.”
- LDC's on several occasions failed to provide documentation that they had performed the required periodic review of operator personnel to determine the ***effectiveness and adequacy of procedures*** used in normal operations.

# Audit Indicators

- The Inspector showing up to conduct your audit is a FIRED FORMER EMPLOYEE !





# Emergency Plans

- (b) Each operator shall:
  - (3) Review employee activities to determine whether the procedures were effectively followed in each emergency.

# Response - Intent

- “If things went right, they did ok.”
- These changes result in a requirement that an operator *judge the performance* of its personnel after the emergency is over.

# Audit Indicators



DOT AND “60 MINUTES” ALL  
SHOW UP AT YOUR MAIN  
OFFICE ; AT THE SAME  
TIME THE SATELLITE  
TRANSMISSION TRUCK  
ARRIVES !

# External corrosion control: Monitoring

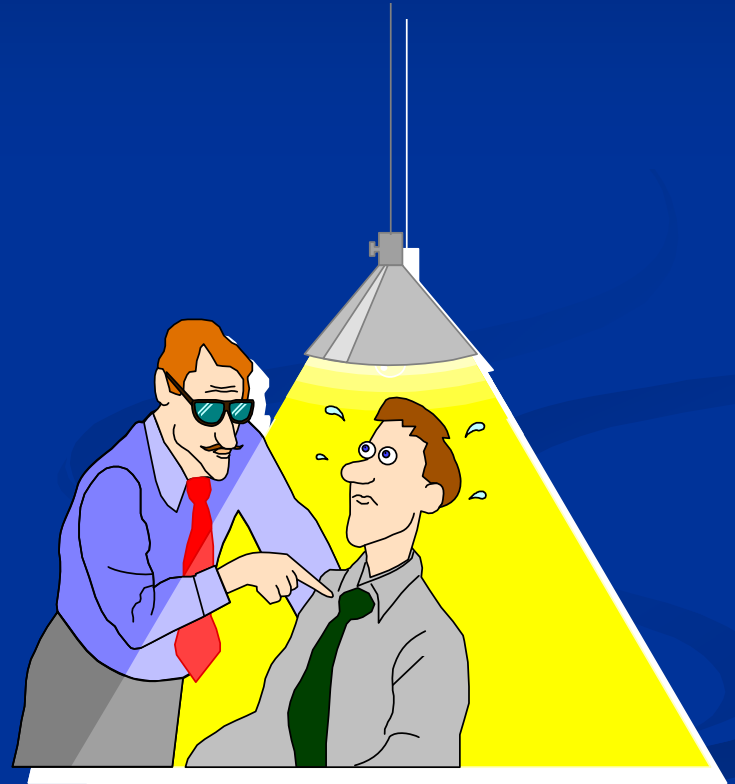
- (a) Each pipeline that is under cathodic protection must be tested at least once each calendar year....
- ...not in excess of 100 feet (30 meters), or separately protected service line, these pipelines may be surveyed on a sampling basis.

# Problems

- No paper trail to document follow up actions taken as a result of “low reads” discovered during monitoring.
- Not included or not evenly distributed throughout the system.

# Audit Indicators

- The Inspector opens the audit with the following statement:
- “You have the right to remain silent.”



# Test requirements for reinstating service lines

- (a) Except as provided in paragraph (b) of this section, each disconnected service line must be tested in the same manner as a new service line, before being reinstated

# Response - Intent

- The ordinary meaning of "disconnect" is to detach or physically separate. This physical separation does not necessarily occur at or near the gas main but may occur anywhere along the length of a service line. A disconnection of this type may be caused by outside forces, routine maintenance, or by compliance with the abandonment requirements of section 192.725(b).



# Audit Indicators

- After a complete inspection of your gas system, the Inspector asks you this question:

“Have you ever considered working in another occupation?”



# Emergency Plans

- **(c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:**
  - (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;
  - (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;
  - (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and,
  - (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.

# Response - Intent

- “We talk to them”
- Read the four criteria carefully for meaning.

# Atmospheric Corrosion

- (a) Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:
  - If the pipeline is located: Then the frequency of inspection is:
    - Onshore At least once every 3 calendar years, but with intervals not exceeding 39 months

# Response - Intent

- Meter readers turn in reports of those that need attention.
- Reporting by exception does not constitute adequate documentation that the required inspections have been performed.

# General

- 192.13(c) Each operator shall ***maintain***, modify as appropriate, and ***follow*** the plans, procedures, and programs that it is required to establish under this part.

# Number 1 Problem

**NOT MEETING DEADLINES FOR  
REQUIRED INSPECTION  
ACTIVITIES !!!**